

Neil Burchard  
Hartford City Paper, L.L.C.  
501 S.Spring Street  
Hartford City, IN 47348

Re: 009-12950  
First Administrative Amendment to  
FESOP 009-7409-00016

Dear Neil Burchard:

Hartford City Paper, L.L.C. was issued a Federally Enforceable State Operating Permit on June 08, 2000 for operating a stationary paper recycling facility utilizing two (2) natural gas fired boilers using no. 2 fuel oil as backup. A letter requesting addition of insignificant activities to this FESOP was received on November 10, 2000. Pursuant to the provisions of 326 IAC 2-8-10 (a)(15) the permit is hereby amended as follows (language deleted is shown with ~~strikeout~~ and added is shown in **bold**):

The Permittee has requested to add following emission units as insignificant activities to this permit:

1. one 180,000 gallon #2 fuel oil storage tank. (*insignificant activity as per 326 IAC 2-7-1 (21) (A)*). The calculations showing the VOC emissions from this tank are attached to this letter. The potential to emit VOC is 0.019 tons per year from this storage tank.
2. one 224 HP emergency diesel fire pump. (*insignificant activity as per 326 IAC 2-7-1 (21) (G) (xxii) (CC)*)
3. one 275 gallons diesel storage tank. (*insignificant activity as per 326 IAC 2-7-1 (21) (G) (ii) (BB)*)
4. one 400 gallons diesel storage tank and equipment refueling area. (*insignificant activity as per 326 IAC 2-7-1 (21) (G) (ii) (BB)*)
5. one 400 gallons kerosene storage tank and equipment refueling area. (*insignificant activity as per 326 IAC 2-7-1 (21) (G) (ii) (BB)*)
6. one 400 gallons gasoline storage tank and equipment refueling area. (*insignificant activity as per 326 IAC 2-7-1 (21) (G) (ii) (AA)*)
7. two natural gas fired space heaters rated 5 million Btu per hour 200,000 Btu per hour. (*insignificant activity as per 326 IAC 2-7-1 (21) (G) (i) (AA)(aa)*)
8. one paper recycling process with maximum capacity of 15.6 tons of paper per hour, with potential to emit VOC of 5.46 tons per year as shown in the attached calculations. (*insignificant activity as per 326 IAC 2-7-1 (21) (A)*).

### Emission Calculations

See Appendix A of this document for detailed emissions calculations. These also include calculations submitted by the applicant which have been verified and found to be accurate and correct.

The emergency diesel fire pump is determined to be an insignificant activity. Based on the EPA guidance, the maximum usage of this emission unit is assumed to be 500 hours in a year. This usage will result in 0.11 tons of SO<sub>2</sub> emissions per year. The calculations showing these emissions are attached to this letter. The source wide SO<sub>2</sub> emissions are limited to 99 tons per year, based on condition D.1.2 of the permit by limiting the #2 fuel oil usage for the two boilers to 232,390 gallons per month. This additional SO<sub>2</sub> emissions from the emergency diesel fire pump

operation will still keep the annual SO<sub>2</sub> source-wide emissions below the 100 tons per year threshold, so that the requirements of 326 IAC 2-7 do not apply to this source.

### Potential To Emit of the Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	0.12
PM-10	0.12
SO <sub>2</sub>	0.11
VOC	5.6
CO	0.37
NO <sub>x</sub>	1.74

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any criteria pollutant is less than the threshold levels specified in 326 IAC 2-1.1-3 (d)(1). Therefore, the modification is exempt from 326 IAC 2-8-11.1 permit revisions. Therefore, this equipment is being added to the FESOP as an administrative amendment subject to 326 IAC 2-8-10 (a) (15) “..incorporates a modification that is subject to .. New Source Performance Standard (NSPS)...”.

### Permit Changes

The following changes are made to the permit conditions.

- The condition A.3 in Section A of the permit is amended as follows:

#### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source ~~does not currently have any~~ **also includes the following** insignificant activities, as defined in 326 IAC 2-7-1(21):-

- one (1) above ground diesel storage tank, with a maximum storage capacity of 180,000 gallons.**
- one (1) emergency diesel fire pump, with a maximum capacity of 224 horsepower.**
- two (2) natural gas fired space heater, with a maximum heat input rate of 5 million Btu per hour and 200,000 Btu per hour.**
- one (1) diesel storage tank with a maximum storage capacity of 275 gallons.**
- one (1) diesel refueling area and storage tank with maximum storage capacity of 400 gallons.**
- one (1) kerosene refueling area and storage tank with maximum storage capacity of**

**400 gallons.**

- (g) one (1) gasoline refueling area and storage tank with maximum storage capacity of 400 gallons.**
- (h) one (1) paper recycling process with maximum capacity of 15.6 tons of paper per hour.**

- 2. The 180,000 gallon storage tank is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart Kb).

A new Section D.2 is added on page 27a of 33 of the permit as follows:

## **SECTION D.2 FACILITY OPERATION CONDITIONS**

### **Facility Description [326 IAC 2-8-4(10)]:**

- (a) one (1) above ground diesel storage tank, with a maximum storage capacity of 180,000 gallons.**

**(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.2.1 40 CFR Part 60.116b, Subpart Kb Record Keeping Requirements (Storage Vessels)**

**Pursuant to 40 CFR Part 60.116, Subpart Kb, the Permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

#### **Attachments**

GS

cc: File - Blackford County  
U.S. EPA, Region V  
Blackford County Health Department  
Air Compliance Section Inspector – Jim Thorpe  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT**

**Hartford City Paper, L.L.C.  
501 South Spring  
Hartford City, Indiana 47348**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F009-7409-00016	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: June 8, 2000
First Administrative Amendment :009-12950	Pages affected: 3, 4 and 5 Pages added: 27a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]**

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

- C.17 Monitoring Data Availability
- C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

**Stratospheric Ozone Protection**

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

**SECTION D.1 FACILITY OPERATION CONDITIONS - Two (2) Natural Gas Fired Boilers**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]
- D.1.2 FESOP Limit [326 IAC 2-8]
- D.1.3 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1] [326 IAC 12-1]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]
- D.1.6 Sulfur Dioxide Emissions and Sulfur Content

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- D.1.7 Visible Emissions Notations

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

- D.1.8 Record Keeping Requirements
- D.1.9 Reporting Requirements

**SECTION D.2 FACILITY OPERATION CONDITIONS - One(1) diesel storage tank**

**Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

- D.2.1 40 CFR Part 60.116b, Subpart Kb Record Keeping Requirements (Storage Vessels)

**Certification Form**

**Emergency/Deviation Form**

**Natural Gas Fired Boiler Certification**

**Quarterly Report Form**

**Quarterly Compliance Monitoring Report Form**

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary paper recycling facility utilizing two (2) natural gas-fired boilers using no. 2 fuel oil as backup.

Authorized individual: Neil Burchard  
Source Address: 501 South Spring, Hartford City, IN 47348  
Mailing Address: P.O. Box 30, Hartford City, IN 47348  
Phone Number: (765) 348-5440  
SIC Code: 2631  
County Location: Blackford  
County Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD or Emission Offset Rules;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) natural gas fired boiler (using no. 2 fuel oil as backup, with a maximum sulfur content of 0.5%), identified as Boiler 1, with a maximum heat input rate of 67.5 million (MM) British thermal units (Btu) per hour, and exhausting through stack 1; and
- (b) One (1) natural gas fired boiler (using no. 2 fuel oil as backup, with a maximum sulfur content of 0.5%), identified as Boiler 2, with a maximum heat input rate of 45.7 MMBtu per hour, and exhausting through stack 2.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) one (1) above ground diesel storage tank, with a maximum storage capacity of 180,000 gallons.
- (b) one (1) emergency diesel fire pump, with a maximum capacity of 224 horsepower.
- (c) two (2) natural gas fired space heater, with a maximum heat input rate of 5 million Btu per hour and 200,000 Btu per hour.
- (d) one (1) diesel storage tank with a maximum storage capacity of 275 gallons.
- (e) one (1) diesel refueling area and storage tank with maximum storage capacity of 400 gallons.

- (f) one (1) kerosene refueling area and storage tank with maximum storage capacity of 400 gallons.
- (g) one (1) gasoline refueling area and storage tank with maximum storage capacity of 400 gallons.
- (h) one (1) paper recycling process with maximum capacity of 15.6 tons of paper per hour.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

## **SECTION D.2**

## **FACILITY OPERATION CONDITIONS**

### **Facility Description [326 IAC 2-8-4(10)]:**

- (a) one (1) above ground diesel storage tank, with a maximum storage capacity of 180,000 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

- D.2.1 40 CFR Part 60.116b, Subpart Kb Record Keeping Requirements (Storage Vessels)  
Pursuant to 40 CFR Part 60.116, Subpart Kb, the Permittee shall keep readily accessible records showing the dimension of the storage tank and an analysis showing the capacity of the storage tank.



**Appendix A: Emission Calculations**  
**Internal Combustion Engines - Diesel Fuel**  
**Turbine (>250 and <600 HP)**  
**Reciprocating**

Page 2 TSD App A

**Company Name:** Hartford City Paper, L.L.C.  
**Address City IN Zip:** 501 South Spring, Hartford City, IN 47348  
**CP#:** 009-12950  
**Plt ID:** 009-00016  
**Reviewer:** GS  
**Date:** November 28, 2000

**Emissions calculated based on output rating (hp)**

Heat Input Capacity  
Horsepower (hp)

Potential Throughput  
hp-hr/yr

224.0

112000.0

Emission Factor in lb/hp-hr	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	0.12	0.12	0.11	1.74	0.14	0.37

**Methodology**

Potential Throughput (hp-hr/yr) = hp \* 500 hr/yr

Based on 500 hours of operation.

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton )

\*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.